

EXHIBIT D

From: Priselac, Jessica

Sent: Tuesday, December 8, 2020 11:12 AM

To: 'Christopher Geddis' <CGeddis@mazieslater.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>

Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Chris,

Subject to the parties reaching agreement on the length of 30(b)(6) testimony, or the Court issuing an order thereon, and subject to certain other requirements, such as a witness's right to invoke Chinese state secrecy and/or privacy rules, ZHP, Prinston, and Solco propose the following witnesses for individual and 30(b)(6) testimony, along with the dates of their availability and the locale in which they will be appearing for their deposition:

No.	Witness	Party	30(b)(6)?	Available Dates	Locale
1.	John Iozzia	Huahai US	No	January 20-22	U.S.
2.	Lijie Wang	Prinston	Yes	January 26, 28, 29	U.S.
3.	Remonda Gergis	Prinston	No	February 2-4	U.S.
4.	Hai Wang	Solco	Yes	February 16,17,18	U.S.
5.	Jun Du	ZHP/ Prinston/ Huahai US	No	March 10,11	U.S.
6.	Jay (Jie) Wang	ZHP	Yes	March 2-3	Hong Kong
7.	Linda (Lihong) Lin	ZHP	Yes	March 4-5	Hong Kong
8.	Peng Dong	ZHP	Yes	March 8-9	Hong Kong

9.	Eric Gu	SynCores	Yes	March 11-12	Hong Kong
10.	Minli Zhang	ZHP	Yes	March 16-17	Hong Kong
11.	Qiangming Li	ZHP	Yes	March 18-19	Hong Kong
12.	Min Li	ZHP	Yes	March 24-25	Hong Kong
13.	Jucaí Ge	ZHP	Yes	March 31 – April 1	Hong Kong

We look forward to our meet and confer with you on this issue later today.

Best regards,

Jessica

Jessica Priselac

Attorney at Law

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From: Christopher Geddis <CGeddis@mazieslater.com>

Sent: Friday, December 4, 2020 5:11 PM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Cc: Priselac, Jessica <JPiselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>

Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Seth,

3:00 pm ET on Tuesday works for Plaintiffs. Ahead of the call, please let us know via email some preliminaries, such as the identities of deponents, where they are located or where the depositions would take place (if not remote), available dates, etc. This will allow for a more productive meet and confer.

Thanks,
Chris

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Friday, December 4, 2020 11:33 AM
To: Christopher Geddis <CGeddis@mazieslater.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>
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Chris, we are available at 1:00 or 3:00 on Tuesday.



From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Friday, December 4, 2020 10:56 AM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>
Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Seth,

Plaintiffs are available Tuesday at 2:00 pm ET. Does that work for you?

And going forward, please include Adam, Cheryll, Layne, and George on emails regarding the ZHP entities' depositions. Thanks.

Best,
Chris

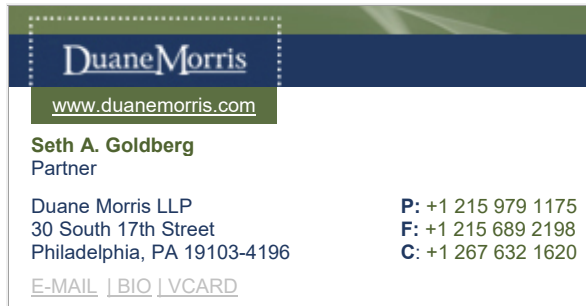
From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Thursday, December 3, 2020 3:51 PM
To: Christopher Geddis <CGeddis@mazieslater.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara

<BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>
Subject: ZHP/Prinston/Solco Depositions Meet and Confer

Chris,

Please let us know if Monday at 1:00 works for you to discuss the ZHP/Prinston/Solco depositions.

Seth



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